

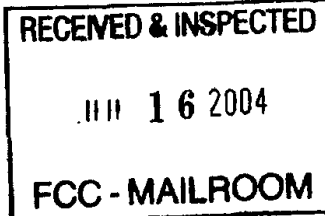


STAR TELEPHONE MEMBERSHIP CORPORATION

P. O. BOX 348, CLINTON, NORTH CAROLINA 28329

Lyman M. Horne
Executive Vice President and General Manager

Writer's Direct Dial Number
910-564-7827



July 7, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20544

Re: In the Matter of The Pay Telephone Reclassification and Compensation
Provisions of the Telecommunications Act of 1996, CC Docket 96-128

Dear Ms. Dortch:

Star Telephone Membership Corporation ("STMC") submits this letter and accompanying certification as record that STMC is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")¹, released on October 3, 2003.

As STMC is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to Payphone Service Providers, STMC is not subject to such requirements at this time. If STMC's operations are altered to the extent that STMC necessarily becomes a Completing Carrier, STMC will fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,

Lyman M Horne
Executive Vice-President and General Manager
Star Telephone Membership Corporation

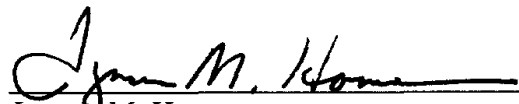
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¹ The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).

**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF STAR TELEPHONE MEMBERSHIP CORPORATION**

1. My name is Lyman M. Horne. I currently serve as the Executive Vice-President and General Manager of Star Telephone Membership Corporation (STMC), a provider of local exchange telecommunications services as an Independent Local Exchange Carrier in the state of North Carolina. In this capacity, I have become familiar with the network operations of STMC and its practices associated with the completion of calls originated from Pay Telephones.
2. STMC is not a Completing Carrier as defined by Commission in 47 CFR § 64.130.
3. STMC's provision of operator services for the completion of local calls from pay telephones is handled by Sprint through a contractual arrangement.
4. STMC has confirmed with Sprint that any calls processed by Sprint are included in the respective call tracking systems and compensation remittance process of Sprint.
5. STMC does not currently provide a coinless access code service.
6. STMC does not currently provide a subscriber toll-free service
7. In consideration of the aforementioned facts, STMC is not subject to the compensation or reporting requirements related to the Commission's Report and Order¹ and associated revision to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 7, 2004.



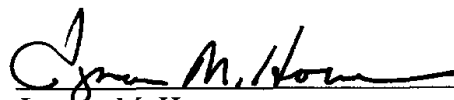
Lyman M. Horne
Executive Vice-President and General Mgr.
Star Telephone Memberships Corporation
3900 N US Hwy 421
PO Box 348
Clinton, NC 28329

¹ The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).

**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF STAR TELEPHONE MEMBERSHIP CORPORATION**

1. My name is Lyman M. Horne. I currently serve as the Executive Vice-President and General Manager of Star Telephone Membership Corp. (STMC), a provider of interstate interexchange telecommunications services as a toll reseller in the state of North Carolina. In this capacity, I have become familiar with the network operations of STMC and its practices associated with the completion of calls originated from Pay Telephones.
2. STMC is not a Completing Carrier as defined by Commission in 47 CFR § 64.130.
3. With respect to coinless or access code calls, STMC is a switchless reseller. STMC contracts with Sprint for completion of calls originated by access code.
4. With respect to subscriber toll-free payphone calls, STMC is a switchless reseller.
5. STMC does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.
6. STMC does not create all detail records for either access code calls or subscriber toll-free payphone calls. STMC's action with respect to call detail records is limited to rating and billing.
7. STMC has confirmed with Sprint that any calls purchased by STMC are included in the respective call tracking systems and compensation remittance process of Sprint.
8. In consideration of the aforementioned facts, STMC is not subject to the compensation or reporting requirements related to the Commission's Report and Order¹ and associated revision to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 7, 2004.



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